

**Environmental
Resources
Management**

5788 Widewaters Parkway
Dewitt, NY 13214
(315) 445-2554
(315) 445-2543 (fax)



14 January 2008

Mr. Chris Milack
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau B
625 Broadway
Albany, New York 12233-7016

RE: Review of Soil Vapor Sampling Work Plan
Former Magna Metal Site
Cortlandt, New York
ERM Project No. 0072454

Dear Mr. Milack,

On behalf of Baker Properties (Baker), Environmental Resources Management (ERM) reviewed the AKRF Soil Vapor Sampling Plan (Sampling Plan) for the Magna Metals Site (NYSDEC Site No. 360003) dated October 2007.

ERM presents the following comments and observations for your review and consideration:

- The Sampling Plan does not include the installation of a sub-slab vapor monitoring point to enable sampling of the sub-slab vapor at the same time and place of the collection of indoor ambient air at sampling location AA-10 in the PolyMedco copy room area, which is a requirement stated in Section 2.2.4 of the NYSDOH Guideline;
- The Sampling Plan does not specify that indoor air sampling duration should at minimum be at least an 8hr sample for a workplace with a single and 24 hr samples for a work place with a multiple shifts as stated in Section 2.7.3 of the NYSDOH Guideline;
- The Sampling Plan does not specifically state the goal of the sampling plan, therefore, if the goal of the sampling plan is to obtain sampling results that represent average concentrations over a longer period, then Section 2.7.3 states that longer duration sampling periods such as 24 hours may be appropriate to be included in this soil vapor sampling work plan;

- The Sampling Plan does not specifically state that a full sample volume of the 6-Liter Summa canisters will be required since the EPA Method TO-15 analytical methods requires a sufficient sample volume (i.e., the full sample volume of a 6-Liter Summa canisters) to achieve a the detection limit of < 0.25 mcg of TCE that is contained in Matrix 1 of the NYSDOH Guideline;
- The Sampling Plan does not specify that outdoor air samples should be collected to characterize site specific background outdoor air conditions as required in the Section 2.2.5 of the NYSDOH Guideline;
- The Sampling Plan does not specify that the indoor/outdoor ambient air and sub-slab vapor sampling should occur during the 2007-2008 heating season.
- The Sampling Plan does not require that there should be sufficient resources for transporting, setting up, purging and initiating the start of sample collection at the fourteen sampling locations to insure that the outdoor and indoor ambient air and sub-slab vapor samples have a least 24-hour sampling period.
- The Sampling Plan does not specify that all indoor ambient air and sub-slab vapor sampling results should be compared to the concentration levels of compound contained in Matrix 1 of the NYSDOH Guideline;
- The Sampling Plan does not specify that appropriate actions developed from the interpretations of the analytical results should be consistent with the recommendations and mitigation requirements contained in Matrix 1 of the NYSDOH Guideline;

In addition, ERM present the following observations and comments in regards the analytical results of the soil vapor sampling that was conducted the facility in 2007:

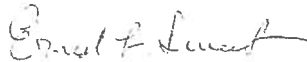
- SV-12 soil vapor sample collected from the sub-slab under the PolyMedco Office/Laboratory was reported to contain $66,000$ mcg/m³ of TCE in sub-slab soil vapor and Indoor Ambient Air sample AA-12 collected from PolyMedco Office/Laboratory employee occupied area was reported to contain 2.9 mcg/m³ of TCE in the indoor ambient air of the PolyMedco Office/Laboratory employee occupied area;
- Matrix 1 of the NYSDOH Guidelines indicate that the above combination of sub-slab soil vapor and indoor ambient air concentration levels of TCE require mitigation;

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Please call me Mr. Ed Hinchey or Mr. Ernie Sweet if you have any questions or need additional information.

Sincerely,



Ernest L Sweet C.I.H
Senior Project Manager



Edward Hinchey, P.G.
Principal-in-charge

C: Don Duthaler – Baker
Doreen Simmons – Hancock & Estabrook

